

Responses to Shadingfield, Sotterley, Willingham & Ellough Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 13 July 2022 to 7 September 2022

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What is the purpose of this document?

Shadingfield, Sotterley, Willingham & Ellough Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 13th July 2022 to 7th September 2022.

East Suffolk Council

This is a well written neighbourhood plan that presents the vision for the neighbourhood area. The plan contains well written policies covering a wide range of topic areas to reflect their local importance. Local engagement and a good evidence base supports the neighbourhood plan. Please see detailed comments from East Suffolk Council below.

List of Policies, p. 5

Page numbers against the list of policies and hyperlinks to the policy section of the document would be helpful.

Paragraph 61, p. 20

This paragraph states that ‘as there are no planning policies relating specifically to County Wildlife Sites or Priority Habitats in the Waveney Local Plan’. Policy WLP8.34 does reference both County Wildlife Sites and Priority Habitats so this text should be removed.

NEP 1 p. 20

The desire to maximise the delivery of Biodiversity Net Gain (BNG) from new developments in criterion (a) is welcomed, but there does not appear to be any definition or criteria relating to what types of new development will be required to deliver BNG. The most recent Government consultation on BNG indicated that their preference is that householder developments are excluded from nationally set BNG requirements. This should be addressed so as to avoid creating a situation where developments are unable to deliver the required amount of BNG on a technicality related to the calculation metrics (for example if the final approved metrics are not designed to be applicable to householder type developments).

Suggested re-wording for a): ‘New development proposals should maintain and, where possible, enhance biodiversity and the natural environment, avoid fragmentation of wildlife habitats, corridors and networks, and encourage biodiversity net gain. In line with the Environment Act 2021, new proposals (except for householder development) should achieve a minimum of 10% net gain in biodiversity. Proposals to achieve the aspirational target of 20% advocated by Suffolk County Council will also be supported...’

SSWE Policy BEP1: Business Development

B. – Formatting: this criterion is more indented than the others.

Paragraph 68 p.22

Refers to ‘graded listed buildings’. This should be amended to just ‘listed buildings’.

SSWE Policy HP3: Housing Density, mix and design

C. – The neighbourhood plan does not have the necessary evidence base to justify specific

housing mix requirements. At para. 31, the National Planning Policy Framework says that the preparation of planning policies should be underpinned by relevant evidence which is adequate and proportionate. It is expected that these types of housing mix requirements should be supported by a Housing Needs Assessment. The objective of this part of the policy could be expressed in a more aspirational way, but in the Council's view it is not appropriate for this criterion to be a firm requirement. The local plan policy WLP8.1 deals with this matter in a similar way to this policy as it is currently written, therefore the aims of the policy are already well embedded in the development plan. Suggested re-wording for this criterion: "Proposals for new residential developments for two or more dwellings will be supported where at least 40% of the new dwellings are 1 or 2 bedroom properties and at least 35% are family homes of 3 bedrooms."

STP1 p. 31

This policy solely relates to residential developments however, to encourage active travel safe connections to end uses such as shops, community and employment opportunities are also important. This means the inclusion of employment and other forms of development in the policy should also be considered.

Appendix 6 p.53

It might also be useful to include a link to the council's historic environment SPD, which elaborates on the criteria for NDHAs (<https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>, pg. 136).

Community Governance Review

East Suffolk Council is in the process of undertaking a Community Governance Review of all parishes in the district. The final recommendations, including a change to the Parish boundary of Shadingfield, are due to be considered by the Council at their meeting on 28th September 2022. The recommended change to the boundary of Shadingfield Parish would result in a small reduction in the size of the parish, meaning thirteen properties would change from Shadingfield to Redisham Parish. The Re-organisation Order is planned to be made in October 2022. More detailed information is available here:

<https://www.eastsuffolk.gov.uk/elections/community-governance-review-cgr/east-suffolk-council-community-governance-review-2021-2022/>. It is expected that the Examiner will have regard to this in considering the appropriate area in which to hold a referendum.

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the

area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here¹¹](#)) or protected species. To help you do this, Natural England has produced advice [here¹²](#) to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land¹³](#).

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this¹⁴](#)).

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

⁹ <https://webarchive.nationalarchives.gov.uk/ukgwa/20140712055944/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <https://webarchive.nationalarchives.gov.uk/ukgwa/20140712055944/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>